

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff/Moving Party

-and-

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN
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51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE
56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

RESPONDING SUPPLEMENTARY MOTION RECORD

February 7, 2022

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

Keith Wilson (

Eva Chipiuk (

Allison Pejovic

Andre Memaury (SK#: [REDACTED]

**Counsel for the Defendants Chris Barber,
Tamara Lich, and Benjamin Dichter**

TO: CHAMP & ASSOCIATES
Barristers and Solicitors

[REDACTED]
[REDACTED]
Paul Champ (LSO# [REDACTED])
[REDACTED]
[REDACTED]

Counsel for the Plaintiff

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TAB 1

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

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Defendants/Responding Parties

Proceeding under the *Class Proceedings Act*, 1992

**AFFIDAVIT OF CATHY GENDRON
(Sworn February 6, 2022)**

I, **Cathy Gendron**, of City of Rockland, in the Province of Ontario, MAKE OATH AND SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.
2. I am 62 years old and am a retired homemaker. Prior to retiring, I worked part-time at my husband's transmission business. We also fostered children prior to retiring.
3. Since the Freedom Convoy 2022 ("Freedom Convoy") arrived in Ottawa on January 28, 2022, I have attended the protest at Parliament Hill on three occasions. Sunday, January 29 from 10:00am - 4:00pm, Monday, January 30 from 10:30am - 4:30pm and on Saturday, February 5 from 11:00am - 3:30pm.
4. I parked in the Strathcona Park area and walked downtown. The truck horns could not be heard until I got close to Parliament Hill. Although the honking was loud and fairly consistent, I could still hold conversations with people and hear the speakers on stage.
5. In doing so, I have visited and spoken with many truckers and supporters of the Freedom Convoy located on Rideau St., Bank St., Kent St. And Wellington. I estimate I have spoken to approximately 100 truckers and supporters since January 28, 2022. What I have observed is that the truckers I have interacted with have, at all times, been friendly, helpful and respectful. I witnessed truckers and supporters shovelling snow and ice from sidewalks, picking up garbage from the street and very happy to chat with passersby.

6. At no time during my visits to the protest did I ever feel unsafe. The atmosphere was peaceful and happy the entire time, with a lot of smiling people. I walked around the downtown core by myself a lot of the time with no issues at all.

Sworn Remotely by Cathy Gendron of the City)
of Ottawa in the Regional Municipality of)
Ottawa-Carleton before me at the City of)
Brampton in the Regional Municipality of Peel)
on February 6th, 2022 in accordance with)
O.Reg. 431/20, Administering Oath or)
Declaration Remotely.)

DocuSigned by:



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CATHY GENDRON

A Commissioner, etc.

Rosy Rajni B. Rumpal
Barrister, Solicitor and Notary
103 – 60 Queen St. E
Brampton, ON
L6V 1A9

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**AFFIDAVIT OF
CATHY GENDRON**

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

[Redacted]
[Redacted]
[Redacted]

Keith Wilson ([Redacted])
[Redacted]

Eva Chipiuk ([Redacted])
[Redacted]

Allison Pejovic
[Redacted]

Andre Memaury ([Redacted])
[Redacted]

**Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich**

TAB 2

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

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Defendants/Responding Parties

Proceeding under the *Class Proceedings Act*, 1992

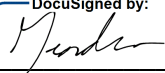
**AFFIDAVIT OF MIKE GENDRON
(Sworn February 6, 2022)**

I, **Mike Gendron**, of City of Rockland, in the Province of Ontario, MAKE OATH AND
SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.
2. I am an active RCMP member who has been placed on leave without pay due to the RCMP's decision to support illegal mandates imposed by our PM.
3. Since the Freedom Convoy 2022 ("Freedom Convoy") arrived in Ottawa on January 28, 2022, I have attended the protest at Parliament Hill everyday since Saturday January 28, 2022.
4. On each occasion I parked my vehicle in the Strathcona Park area and walk to Rideau and Metcalfe where I have been spending the majority of my time.
5. Horns could not be heard until I got close to Parliament Hill. Although the honking was loud and fairly consistent, I could still hold conversations with people and hear the speakers on stage. I have spoken with many truckers since the beginning of this peaceful protest. Initially the horns were not to be used after 11pm. A decision was made to end the horns at 8 pm rather than 11 pm out of respect for the local residents.
6. I have visited and spoken with many truckers and supporters of the Freedom Convoy located on Rideau St. I estimate I have spoken to 100+ truckers and supporters since January 28, 2022. The atmosphere at the Freedom Convoy has been very peaceful. I've observed truckers and supporters shovelling the downtown core, feeding the homeless and providing security for the Terry Fox statue and War Memorial. I've observed truckers interact with young children who are delighted to see the big trucks up close and listen to the horns. On one occasion, I witnessed a trucker exit his vehicle to create a perimeter within a large group of people to allow an individual opposed to the Freedom Convoy,

protest more comfortably. This individual was even acknowledged by the speaker on stage and was met by love and support by everyone.

Sworn Remotely by Michael Gendron of the)
City of Ottawa in the Regional Municipality of)
Ottawa-Carleton before me at the City of)
Brampton in the Regional Municipality of Peel)
on February 6th, 2022 in accordance with)
O.Reg. 431/20, Administering Oath or)
Declaration Remotely.)

DocuSigned by:

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MICHAEL GENDRON



A Commissioner, etc.

Rosy Rumpal
Barrister, Solicitor and Notary
103 – 60 Queen St. E
Brampton, ON
L6V 1A9

ZEXI LE

and

CHRIS BARBER, et al.

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**AFFIDAVIT OF
MIKE GENDRON**

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

[Redacted]
[Redacted]
[Redacted]

Keith Wilson (AB#: [Redacted]
[Redacted]

Eva Chipiuk ([Redacted]
[e](#) [Redacted]

Allison Pejovic
[Redacted]

Andre Memaury ([Redacted]
[Redacted]

**Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich**

TAB 3

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

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Defendants/Responding Parties

Proceeding under the *Class Proceedings Act*, 1992

**AFFIDAVIT OF MONIQUE CAMPEAU-LEBLANC
(Sworn February 06, 2022)**

I, **Monique Campeau-LeBlanc**, of City of Ottawa, in the Province of Ontario, MAKE
OATH AND SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.

2. I was a teacher with the Ottawa Catholic School Board for 35 years and retired in 2015.
3. Since the Freedom Convoy 2022 (“Freedom Convoy”) arrived in Ottawa on January 28, 2022, I attended the protest at Parliament Hill once, have been to Confederation Park three times. In doing so, I have visited and spoken with many truckers and supporters of the Freedom Convoy located on Wellington Ave and Confederation Park. I estimate I have spoken to well over 20 truckers and supporters since January 28th, 2022. What I have observed is that the truckers I have interacted with, at all times were polite, appreciative of our presence, helpful and friendly. I have not observed any aggressive or inappropriate behaviours.
4. I live about 16 blocks or 8 km from the Parliament Hill. After reading a Communique from the Shepherds of Good Hope, an organization I support, I decided to go to Parliament Hill and see what was going on for myself. After hearing from main media how difficult it was to get to the downtown core, I decided to walk to Parliament Hill. The walk was cold and uneventful. As I approached King Edward, the sounds of horns bellowed in the distance, reminding me of a harbour. The trucks honked sporadically, with different intensity and as I approached the noise sounded more like music.
5. Walking back to my condo, about half way there, I did cross a lone wolf with a megaphone who was sharing his personal views. This was about 4 km from the Convoy. I returned downtown three times since and seeing that much of the downtown core was open, I drove to Confederation Park (two blocks from Wellington). The first time I went, the only blockades I encountered were parked police cars of officers redirecting traffic or blocking access to certain roads or entrances. The second and third time I drove to Confederation Park, I used my GPS and it was smooth sailing.

6. I have observed most signs held by protesters were positive asking for change. There were plenty of Canadian flags being worn or waived. The patriotism, camaraderie and unity demonstrated by truckers and protesters alike overshadowed the common negative signs about Prime Minister Trudeau. As for hateful symbols such as the swastika and the Confederate flag, which is repeatedly mentioned in main media, I did not see one. All statues were intact. Garbage was picked up by volunteers and the streets were clean.
7. Actually, my ability to park or to travel in downtown Ottawa has never been easier. There was plenty of parking on Elgin Street. I did not try to approach Wellington or Parliament Hill as there were police blockades and evidently there are trucks parked on part of Wellington. On Canada Day, people typically walk, take public transportation or park quite far and walk. I could find more parking at this event than any Canada Day celebration I have attended. Overall, the atmosphere on Parliament Hill was like being at Canada Day celebrations or a winter carnival. Volunteers were shoveling the sidewalks, food and coffee was being offered free of charge, people were smiling, police officers were pleasant and presentations were uplifting and positive.

8. One presenter even called for patience and understanding of our representatives working inside Parliament as they have a very difficult position. What I read and I what I lived were two very different experiences.

Sworn Remotely by Monique Campeau-)
 LeBlanc of the City of Ottawa in the Regional)
 Municipality of Ottawa-Carleton before me at)
 the City of Brampton in the Regional)
 Municipality of Peel on February 6th, 2022 in)
 accordance with O.Reg. 431/20, Administering)
 Oath or Declaration Remotely.)

DocuSigned by:

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Monique Campeau-LeBlanc


 _____)
 A Commissioner, etc.)

Rosy Rumpal
 Barrister, Solicitor and Notary
 103 – 60 Queen St. E
 Brampton, ON
 L6V 1A9

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**AFFIDAVIT OF
MONIQUE CAMPEAU-LEBLANC**

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

[Redacted]
[Redacted]
[Redacted]

Keith Wilson ([Redacted])
[Redacted]

Eva Chipiuk [Redacted]
[Redacted]

Allison Pejovic
[Redacted]

Andre Memauro [Redacted]
[Redacted]

**Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich**

TAB 4

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

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Plaintiff

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Defendants

Proceeding Under the Class Proceedings Act, 1992

**AFFIDAVIT OF MY TU KAAH
(Sworn February 6, 2022)**

I, My Tu Kaan, of City of Ottawa, in the Province of Ontario, MAKE OATH AND SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.
2. I am employed as a federal employee working at the Canada School of Public Service.

3. Since the Freedom Convoy 2022 ("Freedom Convoy") arrived in Ottawa on January 28, 2022, I have attended the protest at Parliament Hill five (5) times on the following dates and approximate times: on January 29, 2022 from 12:30 to 15:30; on January 30, 2022 from 15:00 to 18:00; on February 1, 2022 from 13:00 to 16:00; on February 2, 2022 from 12:30 to 15:30; and on February 4 from 12:00 to 16:00. On my walks to and from the Hill, I have greeted many truckers and supporters of the Freedom Convoy located on Wellington Street, Metcalf Street, Kent Street, Rideau Street, and Elgin Street. I estimate that I have spoken to a total of 50 truckers and supporters since January 29, 2022. What I have observed is that the truckers I have interacted with have, at all times, been cheerful, smiling, greeting passers with waves, and very open to questions from passers-by. I have not observed any aggressive or inappropriate behaviours.
4. I live approximately four kilometers from the Parliament Hill. I travel on foot to reach Parliament Hill and cut through Metcalf Street, Kent Street, Bank Street, or Elgin Street to reach the Hill.
5. I have observed truckers clearing the snow on streets, scraping the ice off sidewalks, picking up garbage, playing hockey, having cookouts, and chatting with people.
6. While I did not travel downtown by car, based on my observation, it did not appear that traveling downtown by car was impeded to a large degree as streets travelling east to west south of Queen Street were open to traffic. I noticed reduced lanes on Kent Street, Metcalf Street, and Elgin Street (on the portions north of Laurier) , and access completely closed off on Wellington Street and parts of Rideau Street. I did not observe any traffic congestion and would note that in comparison to pre-pandemic rush-hour in downtown Ottawa in the

middle of the winter, traffic was very light. I even saw people arriving downtown and find parking on Metcalf Street south of Somerset.

7. The atmosphere on Parliament Hill was jubilant and filled with joy. Overall, the people in the crowd were respectful and better behaved than many of the Canada Day celebrations on the Hill. While making our way through the crowd on January 29, 2022, I heard one lady thank and greet each passer-by that passed her in the opposite direction. The truckers even fed their supporters, I was offered chips, drinks, burgers, etc. I have rarely experienced this type of hospitality, in the middle of winter, in my own hometown.

Sworn Remotely by MyTu Kaan of the City)

of Ottawa in the Regional Municipality of)

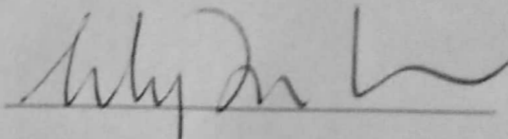
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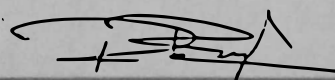
on February 6th, 2022 in accordance with)

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Declaration Remotely.)



MyTu Kaan



A Commissioner, etc.

Rosy Rajni B. Rumpal
Barrister, Solicitor and Notary
103 – 60 Queen St. E
Brampton, ON
L6V 1A9

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
MY TU KAA

JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS

[REDACTED]
[REDACTED]
[REDACTED]

Keith Wilso [REDACTED]
[REDACTED]

Eva Chipiuk [REDACTED]
[REDACTED]

Allison Pejovic
[REDACTED]

Andre Memauro ([REDACTED])
[REDACTED]

Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich

TAB 5

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

ONTARIO
SUPERIOR COURT OF JUSTICE

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Plaintiff

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Defendants

Proceeding under the *Class Proceedings Act*, 1992

AFFIDAVIT OF RICHARD MUSCA
(Sworn February 6, 2022)

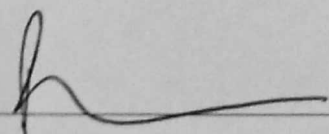
I, Richard Musca, of City of Ottawa, in the Province of Ontario, MAKE OATH AND
SAY:

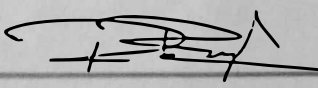
1. I have personal knowledge of the facts and matters hereinafter deposed to.

2. I am a pastor of a small home church in Ottawa.
3. Since the Freedom Convoy 2022 ("Freedom Convoy") arrived in Ottawa on January 28, 2022, I have attended the protest at Parliament Hill every day. In doing so, I have had countless positive interactions with truckers and supporters of the Freedom Convoy located mainly on Wellington, Metcalfe Street and Kent Street. I have never seen so many happy faces and felt so much joy in this city. Just today, February 5, I received an unexpected hug from a very nice lady. My interactions (perhaps approximately 30 every day) are mostly just waving and verbally expressing my gratitude to the truckers for their efforts. I have only had the pleasure of speaking more at length with one trucker so far. He was grateful for my support as an Ottawa resident, and he was disappointed, but, not at all bitter at the opposition by the City of Ottawa Mayor and Media. He struck me as a very gracious soul. I have not observed any aggressive or inappropriate behaviours from the truckers or their supporters.
4. I have been struck by the cleanliness of the streets involved in the convoy and also the respect shown to the statues and sculptures in the area which have been kept clean and free from signs. I have witnessed what I assume are convoy volunteers shovelling snow off of the sidewalks and stairs.

5. The atmosphere on Parliament Hill is absolutely welcoming and pleasant. Though I am not generally comfortable in crowds, I have felt perfectly at ease even in the most crowded spots on Wellington. Everyone is so polite and just plain happy. It is an uplifting and joyful experience which is why I have attended every day.

Sworn Remotely by Richard Musca of the City)
 of Ottawa in the Regional Municipality of)
 Ottawa-Carleton before me at the City of)
 Brampton in the Regional Municipality of Peel)
 on February 6th, 2022 in accordance with)
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 Richard Musca


 A Commissioner, etc.)

Rosy Rajni B. Rumpal
 Barrister, Solicitor and Notary
 103 – 60 Queen St. E
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Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
RICHARD MUSCA

JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS

[Redacted]

Keith Wilson [Redacted]

Eva Chipiuk ([Redacted])

Allison Pejovic
[Redacted]

Andre Memauro [Redacted]

Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich

TAB 6

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

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Plaintiff/Moving Party

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**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and
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JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act*, 1992

**AFFIDAVIT OF WILFRID LEBLANC
(Sworn February 6, 2022)**

I, **Wilfred Leblanc**, of City of Ottawa, in the Province of Ontario, MAKE OATH AND
SAY:

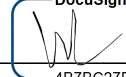
1. I have personal knowledge of the facts and matters hereinafter deposed to.

2. I am currently receiving Employment Insurance, due to the restrictions and the lack of work it brought to the garage door industry. I worked as a garage door technician/construction for 7 years. Before that I worked as a Team Leader for the Canada Revenue Agency for 6 years.
3. Since the Freedom Convoy 2022 (“Freedom Convoy”) arrived in Ottawa on January 28, 2022, I have attended the protest at Parliament Hill twice so far. I attended the first day, January 29th from approximately 12:00 p.m. to early evening. I was in attendance with my sister and my 13-year-old son. We drove around downtown Ottawa as well as the market because we wanted to see what everything looked like. We then easily found parking.
4. The second time I attended the Freedom Convoy was January 31st, 2022 with my mother who lives eight kilometres from Parliament hill. We decided to walk down to Parliament hill and, to our surprise, the traffic was totally clear until I got to the Rideau Centre.
5. The two days I attended the Freedom Convoy, I seemed to be more hindered by the Police blockades and huge street graders the city had parked to stop traffic. I found that both days, the atmosphere was one of uplifting positivity and love. We all sang O’Canada, listened to speeches promoting peaceful protest, love and freedom.
6. I heard cheering, singing, praying, and some honking during the day. From my mom’s condo, which is about eight kilometers from Parliament Hill we were able to hear sporadic honking during the day; however, I have not heard any honking at night.

7. I saw Truckers and protesters giving out food and drinks to whom ever wanted some. I saw truckers and protesters cleaning the city whether it was picking up garbage, shoveling, honoring war memorials or cleaning statues. I saw diversity, respect and Canadian pride. I was also very surprised to see that emergency routes were clear even in the thickest of the protest.
8. I have visited and spoken with many truckers and supporters of the Freedom Convoy located on Wellington, King Edward and Sir John A. McDonald parkway. These truckers seemed to be good Canadian folk. They were polite, social and easy to speak with. I was offered food and coffee. I could walk into any group and be welcomed and all the conversations I had was like speaking with an old friend even though we had never met. It was an amazing experience and I am very happy my son was able to live this experience. I would definitely go back with my kids and retired mother. I estimate I have spoken to about 40 -50 truckers and supporters since January 28, 2022. What I have observed is that the truckers I have interacted with have, at all been respectful of people and property.
9. I observed truckers and protesters cleaning the street of garbage and clearing up the snow. There was also cleaning of statues and monuments as well as removal of graffiti. I saw organizers encouraging and reminding truckers as well as protesters to keep the protest peaceful and respectful. I saw good cheer, singing, dancing, cheering, ball hockey games. It was beautiful. I felt safe every time I went and will definitely be returning.
10. My observations of the peaceful protests were the complete opposite of what is being shown in the mainstream media, and I am glad that I was able to show my mom the truth.

Sworn Remotely by Wilfrid Leblanc of the)
 City of Ottawa in the Regional Municipality of)
 Ottawa-Carleton before me at the City of)
 Brampton in the Regional Municipality of Peel)
 on February 6th, 2022 in accordance with)
 O.Reg. 431/20, Administering Oath or)
 Declaration Remotely.)

DocuSigned by:



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Wilfrid Leblanc


 A Commissioner, etc.

Rosy Rajni B. Rumpal
 Barrister, Solicitor and Notary
 103 – 60 Queen St. E
 Brampton, ON
 L6V 1A9

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**AFFIDAVIT OF
WILFRID LEBLANC**

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

[Redacted]
[Redacted]
[Redacted]

Keith Wilson ([Redacted])
[Redacted]

Eva Chipiuk ([Redacted])
[Redacted]

Allison Pejovic
[Redacted]

Andre Memaury [Redacted]
[Redacted]

**Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich**

TAB 7

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

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Plaintiff /Moving Party

-and-

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and
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JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

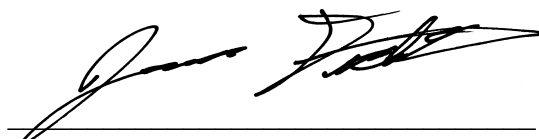
Proceeding under the *Class Proceedings Act, 1992*

**AFFIDAVIT OF BENJAMIN DICHTER
(Sworn February 7, 2022)**

I, **Benjamin Dichter**, of City of Toronto, in the Province of Ontario, MAKE OATH AND
SAY:

1. I am one of the Defendants herein, and as such have personal knowledge of the matters hereinafter deposed to.
2. I reside in the City of Toronto, Ontario and while I did invite truckers to come to Ottawa, Ontario to peacefully protest the Covid-19 vaccine mandates, there are many truckers that I do not know and never been in prior contact with. Based on my discussions with truckers and what I have seen by way of licence plates, there are truckers unknown to me that have come to Ottawa from all provinces and as far as the United States.
3. I do not control the truckers and other participants in the current protest in Ottawa, Ontario.
4. While I do own a truck, my truck is currently in Mississauga, Ontario, and has never been in Ottawa, Ontario.

SWORN REMOTELY by videoconference by)
 Benjamin Dichter, at the City of Toronto,)
 Ontario, before me at the City of Brampton,)
 this 7 day of February 2022 in accordance with)
 O. Reg. 431/20 Administering Oath or)
 Declaration Remotely)


 BENJAMIN DICHTER

Henna Parmar

Barrister & Solicitor, etc.

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
BENJAMIN DICHTER

JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS

[Redacted]

Keith Wilson ([Redacted])

Eva Chipiuk [Redacted]

Allison Pejovic
[Redacted]

Andre Memauro [Redacted]

Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich

TAB 8

Court File No.: CV-22-00088514-00CP

Form 14E

Courts of Justice Act

ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff/Moving Party

-and-

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT CHRIS BARBER
Sworn February 7, 2022

I, **Chris Barber**, of City Swift Current, in the Province of Saskatchewan, MAKE OATH AND SAY:

1. I am one of the Defendants herein, and as such have personal knowledge of the matters hereinafter deposed to.
2. I reside in the City of Swift Current, and while I did publicly invite truckers to come to Ottawa, there are many truckers that I do not know and never been in contact with. In my interactions with the truckers I have spoke to, I have encouraged them all to be respectful of area residents with regard to honking and associated noise.
3. I do own a semi-truck but it is currently in Ottawa, Ontario, but I have not honked my horn while at the Freedom Convoy in Ottawa, Ontario.

SWORN REMOTELY by videoconference)
 by Chris Barber, at the City of Ottawa,)
 Ontario, before me at the City of Brampton,)
 this 7 day of February 2022 in accordance)
 with O. Reg. 431/20 Administering Oath or)
 Declaration Remotely)
)
)

Chris Barber

CHRIS BARBER

Henna Parmar

Barrister & Solicitor, etc.

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**AFFIDAVIT OF
CHRIS BARBER**

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

[Redacted]
[Redacted]
[Redacted]

Keith Wilson ([Redacted])
[Redacted]

Eva Chipiuk [Redacted]
[Redacted]

Allison Pejovic
[Redacted]

Andre Memaury ([Redacted])
[Redacted]

**Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich**

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**RESPONDING SUPPLEMENTARY
MOTION RECORD**

**JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS**

[Redacted]
[Redacted]
[Redacted]

Keith Wilson [Redacted]
[Redacted]

Eva Chipiuk ([Redacted]
[Redacted]

Allison Pejovic
[Redacted]

Andre Memaury ([Redacted]
[Redacted]

**Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich**